## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS

In Re:	)
	) Case No.: 23-30530
DAVID AROMANDO,	
	) Chapter 13
Debtor.	)

## OBJECTION TO NOTICE OF POST-PETITION MORTGAGE FEES, EXPENSES AND CHARGES

COMES NOW the Debtor, David Aromando, by and through his attorney, J.D. Graham, and for his Objection to Notice of Post-Petition Mortgage Fees, Expenses and Charges states as follows:

- 1. On August 4, 2023, the Debtor filed for relief under Chapter 13 of the Bankruptcy Code.
- 2. On February 22, 2024, Lakeview Loan Servicing filed a Notice of Post-Petition Mortgage Fees, Expenses and Charges with the Court in the amount of \$900.00 for the following:

- \$650.00 Proof of Claim

- \$250.00 Proof of Claim 410A History

- 3. Debtor requests the "Proof of Claim" be reduced from \$650.00 to \$250.00 as the fees requested are excessive and not reasonable pursuant to *In re Coates*, 292 B.R. 894 (Bankr. C.D. Ill. 2003), thereby reducing the total amount of the Notice from \$900.00 to \$500.00.
- 4. This district has had a form claim for years. If charging \$300 per hour, it cannot possibly take 2.16 hours to perform that function.

WHEREFORE, Debtor prays for an Order from this Court reducing the "Proof of Claim" from \$650.00 to \$250.00 thereby reducing the total amount of the Notice from \$900.00 to \$500.00, and for such other relief as the Court deems just and proper.

DAVID AROMANDO,

By: /s/ J.D. Graham J.D. Graham, #06211732 Attorney for Debtor J.D. Graham, P.C. #1 Eagle Center, Ste. 3A O'Fallon, IL 62269 618-235-9800 618-235-9805 fax jd@jdgrahamlaw.com

## **Proof of Service**

The undersigned hereby certifies that a copy of the foregoing instrument was served upon the persons listed below that were not noticed electronically by first class mail, postage prepaid this 21st day of March 2024:

Lakeview Loan Servicing c/o Scott Nabke Diaz Anselmo & Associates LLC 1771 West Diehl Road, Suite 120 Naperville, IL 60563

/s/ Shawna Morris